

U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FILED

FEB 25 2022

IN OPEN COURT
TAMMY H. DOWNS

By: _____

DEPUTY CLERK

PLAINTIFF

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

JANICE HARGROVE WARREN

v.

Case No. 4:19-CV-00655-BSM

PULASKI COUNTY SPECIAL
SCHOOL DISTRICT, *et al.*

DEFENDANTS

VERDICT FORM

I. Race discrimination claim

A. On Janice Warren's race discrimination claim, for not being interviewed or hired for the superintendent position, as submitted in Instruction 9, we find in favor of:

Plaintiff Janice Warren or Defendants

Note: If you found in favor of Warren on A, proceed to B. If you found in favor of Defendants on A, proceed to II.

B. Has it been proved that Defendants would not have interviewed or hired Janice Warren regardless of her race?

_____ Yes _____ No

Note: If you answered no to B, then proceed to C. If you answered yes to B, proceed to II.

C. We find Janice Warren's lost wages and benefits through the date of this verdict, as a result of her not being interviewed or hired, to be:

\$ _____ (stating the amount or, if none, write the word "none")

We find Janice Warren's other damages, excluding lost wages and benefits, as a result of race discrimination, to be:

\$ _____ (stating the amount or, if you find that Warren's damages do not have a monetary value, write in the nominal amount of One Dollar (\$1.00).

D. We assess punitive damages, as submitted in Instruction 21, against Defendants, as follows:

PCSSD: \$ _____ (stating the amount or, if none, write the word "none")

Mike Kemp: \$ _____ (stating the amount or, if none, write the word "none")

Linda Remele: \$ _____ (stating the amount or, if none, write the word "none")

Shelby Thomas: \$ _____ (stating the amount or, if none, write the word "none")

Alicia Gillen: \$ _____ (stating the amount or, if none, write the word "none")

Eli Keller: \$ _____ (stating the amount or, if none, write the word "none")

Brian Maune: \$ _____ (stating the amount or, if none, write the word "none")

II. Sex discrimination claim

A. On Janice Warren's sex discrimination claim, for not being interviewed or hired for the superintendent position, as submitted in Instruction 11, we find in favor of:

Plaintiff Janice Warren or Defendants

Note: If you found in favor of Warren on A, proceed to B. If you found in favor of Defendants on A, proceed to III.

B. Has it been proved that Defendants would not have interviewed or hired Janice Warren regardless of her sex?

_____ Yes _____ No

Note: If you answered no to B, then proceed to C. If you answered yes to B, proceed to II.

C. We find Janice Warren's lost wages and benefits through the date of this verdict, as a result of her not being interviewed or hired, to be:

\$ _____ (stating the amount or, if none, write the word "none")

We find Janice Warren's other damages, excluding lost wages and benefits, as a result of sex discrimination, to be:

\$ _____ (stating the amount or, if you find that Warren's damages do not have a monetary value, write in the nominal amount of One Dollar (\$1.00)).

D. We assess punitive damages, as submitted in Instruction 21, against Defendants, as follows:

PCSSD: \$ _____ (stating the amount or, if none, write the word

“none”)

Mike Kemp: \$ _____ (stating the amount or, if none, write the word

“none”)

Linda Remele: \$ _____ (stating the amount or, if none, write the

word “none”)

Shelby Thomas: \$ _____ (stating the amount or, if none, write the

word “none”)

Alicia Gillen: \$ _____ (stating the amount or, if none, write the word

“none”)

Eli Keller: \$ _____ (stating the amount or, if none, write the word

“none”)

Brian Maune: \$ _____ (stating the amount or, if none, write the word

“none”)

III. Retaliation claim

A. On Janice Warren's retaliation claim, for not being interviewed or hired for the position of superintendent, as submitted in Instruction 13, we find in favor of:

Plaintiff

Plaintiff Janice Warren

or

Defendants

Note: If you found for Warren on A, then proceed to B. If you found for Defendants, proceed to IV.

B. We find Janice Warren's lost wages and benefits through the date of this verdict to be:

\$ 208,025.40 (stating the amount or, if none, write the word "none")

We find Janice Warren's other damages, excluding lost wages and benefits, to be:

\$ 125,000- (stating the amount or, if you find that the plaintiff's damages

do not have a monetary value, write in the nominal amount of One Dollar (\$1.00).

C. We assess punitive damages, as submitted in Instruction 21, against Defendants, as follows:

PCSSD: \$ 273,000- (stating the amount or, if none, write the word "none")

Mike Kemp: \$ none (stating the amount or, if none, write the word "none")

Linda Remele: \$ 25,000 (stating the amount or, if none, write the word "none")

Shelby Thomas: \$ none (stating the amount or, if none, write the word

“none”)

Alicia Gillen: \$ 25,000 (stating the amount or, if none, write the word

“none”)

Eli Keller: \$ None (stating the amount or, if none, write the word

“none”)

Brian Maune: \$ None (stating the amount or, if none, write the word

“none”)

IV. Retaliation claim

A. On Janice Warren's retaliation claim, for not being hired for the position of deputy superintendent, as submitted in Instruction 14, we find in favor of:

Defendant
Plaintiff Janice Warren or Defendants

Note: If you found for Warren on A, then proceed to B. If you found for Defendants, proceed to V.

B. We find Janice Warren's lost wages and benefits through the date of this verdict to be:

\$ _____ (stating the amount or, if none, write the word "none")

We find Janice Warren's other damages, excluding lost wages and benefits, to be:

\$ _____ (stating the amount or, if you find that the plaintiff's damages do not have a monetary value, write in the nominal amount of One Dollar (\$1.00)).

C. We assess punitive damages, as submitted in Instruction 21, against Defendants, as follows:

PCSSD: \$ _____ (stating the amount or, if none, write the word "none")

Mike Kemp: \$ _____ (stating the amount or, if none, write the word "none")

Linda Remele: \$ _____ (stating the amount or, if none, write the word "none")

Shelby Thomas: \$ _____ (stating the amount or, if none, write the word

“none”)

Alicia Gillen: \$ _____ (stating the amount or, if none, write the word

“none”)

Eli Keller: \$ _____ (stating the amount or, if none, write the word

“none”)

Brian Maune: \$ _____ (stating the amount or, if none, write the word

“none”)

V. Breach of contract claim

A. On Janice Warren's breach of contract claim for not being interviewed or hired for the position of superintendent, against Defendants, as submitted in Instruction 16, we find in favor of:

		<u>Defendants</u>
Plaintiff Janice Warren	or	Defendants

Note: If you found for Warren on A, then proceed to B. If you found for Defendants, proceed to VI.

B. We find Janice Warren's damages to be \$ _____ (stating the amount)

VI. Breach of contract claim

A. On Janice Warren's breach of contract claim for not being hired for the position of deputy superintendent, against Defendants, as submitted in Instruction 16, we find in favor of:

Plaintiff Janice Warren or Defendants Defendants

Note: If you found for Warren on A, then proceed to B. If you found for Defendants, you have completed your service. Have the foreperson sign and date the verdict form and notify the Court Security Officer that you have reached a verdict.

B. We find Janice Warren's damages to be \$ _____ (stating the amount)

Mark Wood
Foreperson

Dated: 2-25-2022